

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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JUL 26 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

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Truth-in-Billing  
and  
Billing Format

CC Docket No. 98-170

**COMMENTS OF GTE**

Dated: July 26, 1999

GTE Service Corporation and its affiliated  
domestic telephone operating wireless, and  
long distance companies

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## TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION AND SUMMARY .....	2
II. DISCUSSION .....	2
A. Bill design is a competitive issue, and the specific proposed regulations have no relevance to the wireless industry.....	2
1. Competitive pressures ensure that wireless bills are fair, clear, and reasonable.....	3
2. None of the proposed wireline restrictions should apply to the wireless industry.....	5
B. Section 10 does not replace the Commission's duty to adopt rules only when the public interest requires .....	10
1. Applying forbearance where no regulation exists is contrary to the Act's provisions and Congress' intent.....	10
2. The Commission may not substitute the Section 10 forbearance analysis for the public interest standard in adopting regulations.....	12
3. The Commission's proposed Section 10 analysis inappropriately presumes that regulation is appropriate.....	13
III. CONCLUSION.....	15

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GTE Service Corporation and its affiliated domestic telephone operating, wireless, and long distance companies<sup>1</sup> (collectively, "GTE") respectfully submit these comments in response to the *Further Notice of Proposed Rulemaking* on the application of truth-in-billing rules to commercial mobile radio service ("CMRS") providers in the captioned proceeding.<sup>2</sup> GTE urges the Commission to find that it is not necessary to impose additional truth-in-billing regulations on the competitive wireless industry.

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<sup>1</sup> These comments are filed on behalf of GTE's affiliated domestic telephone operating companies, GTE Wireless Incorporated, and GTE Communications Corporation, Long Distance Division. GTE's domestic telephone companies are: GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., and Contel of the South, Inc.

<sup>2</sup> Truth-in-Billing and Billing Format, *First Report and Order and Further Notice of Proposed Rulemaking*, CC Docket 98-170, FCC 99-72, released May 11, 1999 ("FNPRM").

## I. INTRODUCTION AND SUMMARY

In the *FNPRM*, the Commission seeks comment on the billing practices of commercial mobile radio service ("CMRS") providers and whether it should apply certain restrictions designed to prevent slamming and cramming to the wireless industry. The Commission suggests that absent evidence that wireless billing practices require such regulation, parties may wish to address the applicability of a Section 10 forbearance analysis.<sup>3</sup>

GTE submits that the rules the Commission proposes in the *FNPRM* are entirely without relevance to the wireless industry and would disrupt the competitive CMRS marketplace. Moreover, the Commission's suggested use of Section 10 of the Communications Act to determine whether to refrain from adopting the proposed rules is unlawful. Congress intended the Commission to use Section 10 to remove unnecessary regulation, not as a means to determine whether to impose regulations from the outset.

## II. DISCUSSION

### A. **Bill design is a competitive issue, and the specific proposed regulations have no relevance to the wireless industry.**

The Commission seeks comment on how to implement in the CMRS context the general principle that consumers are entitled to fair, clear, and reasonable billing practices. To this end, the Commission urges carriers to provide information on current CMRS billing practices, including the types and descriptions of charges CMRS

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<sup>3</sup> *Id.* at 44-45 (¶¶ 68-69).

providers place on their bills. Finally, the Commission requests comment on whether certain restrictions aimed at wireline carriers should also apply to wireless carriers.<sup>4</sup>

1. **Competitive pressures ensure that wireless bills are fair, clear, and reasonable.**

GTE Wireless must bill its customers in a fair, clear, and reasonable manner today. If it does not, customers in the competitive CMRS marketplace will switch to another carrier. GTE is constantly undertaking efforts to redesign its bills to optimize usability and minimize customer confusion that may result in calls to customer care or ultimately churn. GTE has worked extensively with human factors consultants who provide professional critiques of GTE's bills across several different criteria. These include general organizational structure, flow from summary to detailed information, how to reflect included minutes and feature and equipment items, choice of font and capital letters, use of space, relationships between sections of the bill such as line item totals and subtotals, cosmetic factors such as color of the background, use of labels, table titles, placement of account numbers, and countless other factors. In addition, GTE has planned focus groups to address customer satisfaction. GTE continually updates billing information to customers, which it makes available in bill inserts, bill messages, and as part of "Frequently Asked Questions" and "About Your Bill" sections of its bills.

As evidence that billing is an integral part of the package of services offered to customers, one of the important reasons that GTE has simplified its wireless rate plans

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<sup>4</sup> *Id.*

is to reduce customer confusion about billing. As demonstrated in Attachment A, which contains a number of copies of GTE Wireless bills, GTE provides customers with a breakdown of airtime usage into included and billed minutes. GTE further separates airtime charges, long distance charges, roaming charges, taxes, and surcharges. Attachment B provides a list of the type and description of charges contained on GTE Wireless bills.

The Commission has determined that more detailed regulations are appropriate in the wireline context because most consumers do not yet have significant choice in the carrier they select as their provider of local service.<sup>5</sup> By contrast, as the Commission recently found in its *Fourth Report* to Congress,<sup>6</sup> the mobile telephony marketplace is marked by ever increasing competition and declining prices.<sup>7</sup> Significantly, the Commission found in the *Fourth Report* that consumers have a significant and growing number of mobile service providers to choose from even in more rural areas.<sup>8</sup>

In light of these competitive pressures, wireless carriers must be constantly vigilant to minimize customer confusion and frustration. Each time a customer contacts

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<sup>5</sup> *Id.* at 6 (¶ 6).

<sup>6</sup> Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; *Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, FCC 99-136 (released June 24, 1999).

<sup>7</sup> *Id.* at 7, 11-12, 21.

<sup>8</sup> *Id.* at 6 (there are now at least five mobile telephone operators in each of the 35 largest Basic Trading Areas ("BTAs"), and at least three mobile telephone operators in 97 of the 100 largest BTAs).

GTE, it costs the Company approximately \$1 per minute. Given that wireless customers today will not hesitate to churn,<sup>9</sup> no wireless carrier can afford to bill its customers in anything but a fair, clear, and reasonable manner.

Detailed billing regulations would impose unnecessary costs on wireless carriers and force a degree of uniformity in billing practices when today the customer bill serves as a means for wireless carriers to differentiate themselves in the marketplace. The Commission itself acknowledges that customer complaints in the CMRS context are low in comparison to wireline complaints.<sup>10</sup> Government intervention is therefore completely unsupportable in the competitive wireless marketplace.

**2. None of the proposed wireline restrictions should apply to the wireless industry.**

The Commission seeks comment on whether identifying new service providers (in order to prevent slamming) and “deniable” charges (in order to prevent cramming) makes sense in the wireless context.<sup>11</sup> GTE strongly opposes imposition of either requirement on wireless carriers.

With respect to identifying new service providers, the Commission correctly suggests that rules intended to curb the practice of slamming make little sense in the wireless context. As the Commission recognizes, wireless carriers are not under an

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<sup>9</sup> *Id.* at 24 (industry churn rates average between 2.0 – 4.2 % on a monthly basis).

<sup>10</sup> *FNPRM* at 10-11 (¶ 16).

<sup>11</sup> *Id.* at 45 (¶ 70).

obligation to offer equal access,<sup>12</sup> and the requirement to identify new service providers would therefore most often be irrelevant.<sup>13</sup> Likewise, requiring wireless carriers to identify "deniable" charges does not make sense because CMRS bills do not tie to local wireline service. The Commission should clearly not apply either of these requirements to CMRS carriers.

In the context of considering whether to apply rules to wireless carriers to address cramming concerns, the Commission seeks comment on the accuracy of past assertions by some wireless carriers that cramming is not a problem in the wireless context because wireless carriers do not charge for services rendered by third parties. In particular, the Commission asks whether wireless carriers bill for any other service providers.<sup>14</sup>

Although in most cases it is only a fraction of its total business, GTE Wireless does bill and collect for services on behalf of third parties. GTE Wireless, for example, offers its customers handset insurance. The Company contracts with an insurance provider and bills and collects on behalf of that vendor. Similarly, GTE Wireless offers Mr. Rescue® roadside assistance service.<sup>15</sup> In this case, GTE Wireless does not bill

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<sup>12</sup> 47 U.S.C. § 332(c)(8). GTE Wireless offers equal access on a grandfathered basis in its San Diego market only.

<sup>13</sup> *FNPRM* at 45 (¶ 70).

<sup>14</sup> *Id.*

<sup>15</sup> Mr. Rescue® is a registered trademark of Road Rescue Incorporated. GTE Wireless offers this service under the trade name GTE Wireless Roadside Assistance Service in some markets.



and collect on behalf of the service provider directly, but rather remits a fee to the service provider based on the number of GTE subscribers enrolled in the service. Taken broadly, GTE Wireless also of course bills indirectly on behalf of its roaming partners, and for long distance and such regulatory mandates as E911 surcharges and universal service.<sup>16</sup>

Whether or not cramming occurs in the wireless context depends on how the term "cramming" is defined. The Commission defines cramming as "the practice of causing unauthorized, misleading, or deceptive charges to be placed on customers' telephone bills."<sup>17</sup> Defined in this manner, cramming is extremely unlikely in the CMRS context. Although wireless carriers do some billing for third parties, the nature of services for which wireless carriers bill are much different from those that have given rise to cramming concerns in the wireline context. Thus, while the Federal Trade Commission ("FTC") found that the wireline bill can include charges for services completely unrelated to the wireline service,<sup>18</sup> as demonstrated above, wireless third

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<sup>16</sup> Indeed, the Kentucky Public Service Commission has specifically designated all telecommunications carriers in Kentucky as universal service collection agents. See An Inquiry Into Universal Service and Funding Issues, Commonwealth of Kentucky Public Service Commission, Order, Administrative Case No. 360 (Dec. 28, 1998).

<sup>17</sup> Truth-in-Billing and Billing Format, *Notice of Proposed Rulemaking*, CC Docket No. 98-170, 13 FCC Rcd 18176, 18177-78 (1998).

<sup>18</sup> Pay-Per-Call Review, 63 Fed. Reg. 58524, 58527 (1998). The FTC stated that:

party billing is done only for services ordered by the customer and relating to the underlying wireless service. As a result, the third party billing done by wireless carriers is not likely to lead to "unauthorized, misleading, or deceptive charges" being placed on customers' telephone bills. Thus, the sole fact that wireless carriers bill for these services does not warrant imposing cramming regulations on the wireless industry.

Unfortunately, certain states have defined cramming broadly enough to encompass far more than the FCC standard. For example, the New Mexico Public Regulation Commission ("PRC") has recently implemented interim cramming and slamming rules that apply to wireless carriers.<sup>19</sup> These rules would find a wireless carrier in violation of the PRC's cramming guidelines if: (1) it adds a charge for telecommunications services to a customer's bill without obtaining the customer's authorization, or (2) it places any charges on a customer's bill for goods or services that are not defined as telecommunications. Carriers must obtain customer authorization either through a letter of agency ("LOA") or orally, but then only if the carrier makes

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Consumers can sign up for service in person, and charge the service to a telephone number (their own or someone else's), merely by filling in a phone number on a form. This has resulted in two newer types of unauthorized charges: (1) unauthorized charges billed to a telephone subscriber for a benefit received by someone else, such as entering a sweepstakes to win a prize; and (2) unauthorized charges to consumers who are unaware that by filling out a form, they are deemed to have authorized a telephone-billed purchase.

<sup>19</sup> Adoption of Rules Implementing the New Mexico Slamming and Cramming Act, New Mexico Public Regulation Commission, Order Adopting Emergency Interim Rules Concerning "Slamming" and "Cramming," Utility Case No. 3058 (June 29, 1999).

recordings of all conversations constituting the customer's authorization. The New Mexico rules also provide for an elaborate complaint resolution procedure. Taken to its extreme, it would appear that in New Mexico, wireless carriers may not offer at all such services as roadside assistance, handset insurance, or perhaps even enhanced features such as three-way calling if these services are determined not to be telecommunications services.<sup>20</sup> In addition, wireless carriers in New Mexico must go through the costly verification process every time a customer seeks to change or add to the telecommunications services to which the customer subscribes.

Cramming regulation imposed on the wireless industry would have the perverse effect of inhibiting the ability of wireless service providers to offer innovative services. Indeed, the potential inability of wireless carriers to interact with their customers or offer certain innovative services in the face of the heavy-handed regulation prescribed by the New Mexico PRC demonstrates the impact that such regulation could have. As Commissioner Powell points out, absent well supported and identifiable harms to consumers, cramming regulation is unjustified in the wireless context.<sup>21</sup>

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<sup>20</sup> New Mexico law defines telecommunications services as "the transmission of signs, signals, writings, images, sounds, messages, data or other information of any nature by wire, radio, lightwaves or other electromagnetic means or goods and services relating to the provision of information that are provided by the provider." New Mexico Code title 17, ch. 13, part 8, § 7.15.

<sup>21</sup> *FNPRM* at 71-77, Separate Statement of Commissioner Michael K. Powell. Similarly, Commission Ness stated: "Given that any rules – even flexible ones – impose some costs (which are ultimately paid by consumers), I am reluctant to establish any requirements to cure a non-existent problem. For this reason, at this time, I am inclined to forbear from applying most of the specific rules we promulgate today to wireless carriers." *Id.* at 70, Separate Statement of Commissioner Susan Ness.

**B. Section 10 does not replace the Commission's duty to adopt rules only when the public interest requires.**

In seeking comment on whether to apply truth-in-billing rules to CMRS carriers, the Commission suggests that parties may wish to address the applicability of a Section 10<sup>22</sup> forbearance analysis and demonstrate how that analysis would apply.<sup>23</sup> It appears, therefore, that the Commission proposes to use Section 10 criteria in determining whether to adopt truth-in-billing rules for CMRS providers. Thus, unless parties can demonstrate that the forbearance criteria are met, the Commission will apply the truth-in-billing rules to CMRS carriers. The proposed application of Section 10 in this manner is wrong (1) because it is contrary to the language of the statutory provision and to Congress' intent in adopting Section 10; (2) because it substitutes the forbearance criteria for the public interest standard as the benchmark for FCC rulemaking; and (3) because it considers new regulations presuming from the start that such regulations are necessary.

**1. Applying forbearance where no regulation exists is contrary to the Act's provisions and Congress' intent.**

Section 10 requires that the FCC forbear from applying any regulation or any provision of this Act to a telecommunications carrier or telecommunications service, or class of telecommunications carriers . . . , if the Commission determines that three

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<sup>22</sup> 47 U.S.C. §160(a).

<sup>23</sup> *FNPRM* at 44 (¶ 68).

criteria are met.<sup>24</sup> Implicit in the language of the statute is that the provision being considered currently applies to the carrier or class of carrier. For if the provision does not currently apply, it cannot be considered a "regulation" or "statutory provision" subject to Section 10. In this instance, the truth-in-billing rules have been adopted (though are not yet effective) for non-CMRS providers. Because the rules do not apply currently to CMRS providers, however, there is no regulation or statutory provision from which to forbear.

That forbearance was intended to relieve carriers or classes of carriers from enforcement of regulations or provisions that currently apply is also evident from a review of the legislative history behind the provision. Congress enacted Section 10 as one of its many deregulatory initiatives to "provide for a pro-competitive, de-regulatory national policy framework"<sup>25</sup> for the telecommunications marketplace. The legislative history of Section 10 makes clear that Congress viewed Section 10 as a "tool in ending

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<sup>24</sup> Those criteria are, generally: (1) that enforcement of such regulation or provision is not necessary to ensure just and reasonable rates, terms and conditions or to prevent unreasonable discrimination; (2) that enforcement of such regulation or provision is not necessary to protect consumers; and (3) that forbearance is consistent with the public interest.

<sup>25</sup> H.R. Conf. Rep. No. 458, 104<sup>th</sup> Cong., 2d Sess. 1 (1996).

unnecessary regulation.”<sup>26</sup> The Commission itself has treated forbearance as a means to cancel a regulatory or statutory requirement.<sup>27</sup>

Clearly, in this instance, the Commission is not proposing to use Section 10 to end an existing regulation or cancel an existing regulatory or statutory requirement. Accordingly, application of Section 10 as suggested by the Commission is entirely improper.<sup>28</sup>

**2. The Commission may not substitute the Section 10 forbearance analysis for the public interest standard in adopting regulations.**

The long-accepted standard to be applied by the Commission in deciding whether to adopt a new rule or extend an existing rule to a new set of carriers is the public interest standard. Thus, Section 201(b) of the Act provides that “[t]he Commission may prescribe such rules and regulations as may be necessary *in the*

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<sup>26</sup> HR. Rep. No. 104-204, 104<sup>th</sup> Cong., 1<sup>st</sup> Sess. 89 (1995).

<sup>27</sup> The Commission has analogized Section 10 to a provision of the Federal Aviation Act, which permitted the Civil Aeronautics Board to “exempt” a carrier from compliance with certain regulations. See, e.g., Policy and Rules Concerning the Interstate, Interexchange Marketplace: Implementation of Section 254(g) of the Communications Act of 1934, As Amended, 11 FCC Rcd 20731, 20770-72 (1996).

<sup>28</sup> The Commission seems to imply that the forbearance showing is necessary to justify differential treatment of wireline and wireless carriers. This assumption is also flawed. Section 10 provides the Commission authority to forbear from applying any regulation to a class of telecommunications carriers. Moreover, particularly since Congress adopted the Omnibus Budget Reconciliation Act of 1993, the Commission has often treated wireline and wireless carriers differently, even before the 1996 Act amendments. See, e.g., Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services, GN Docket No. 93-252, 9 FCC Rcd 1411 (1994) (forbearing from applying certain provisions of Title II of the Act to CMRS providers).

*public interest* to carry out the provisions of this Act."<sup>29</sup> However, in suggesting that carriers present Section 10 arguments in an effort to convince the Commission not to adopt truth-in-billing rules to CMRS carriers, the Commission ignored the public interest standard. Thus, rather than demonstrating that truth-in-billing rules are not necessary in the public interest, now parties must demonstrate that such rules (1) are not necessary to ensure just and reasonable rates, terms and conditions or to prevent unreasonable discrimination; (2) are not necessary to protect consumers; and (3) are not consistent with the public interest.

By substituting a Section 10 analysis for the public interest standard, the Commission proposes to apply a more rigid standard (for opponents of the proposed rule) than applies in all other rulemaking contexts. Nowhere in Section 10 or the legislative history of the principle of forbearance is there a suggestion that the Commission can or should substitute the Section 10 forbearance standard for the public interest analysis that is the statutory standard for Commission rulemaking proceedings. Accordingly, the Commission should find that Section 10 criteria have no place in considering whether to apply truth-in-billing rules to wireless carriers.

**3. The Commission's proposed Section 10 analysis  
inappropriately presumes that regulation is appropriate.**

Another troubling aspect of the Commission's Section 10 analysis is that it seems to presume that regulation is the proper course, and that deviation is only appropriate if parties can make the heightened forbearance showing. Commissioner

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<sup>29</sup> 47 U.S.C. § 201(b) (emphasis added).

Powell notes his frustration with the Commission's apparent presumption in favor of regulation:

Despite the truisms of competition, the *Order* suggests in a number of places that requirements like those we adopt here will *always* be needed in *every* market, no matter how competitive. [footnote omitted] These unsupported, blanket assertions are troubling for their unstated, paternalistic judgment that consumers are ill-suited to protect themselves even when they are empowered to escape harm by choosing a new provider. Indeed, these assertions ignore the likelihood that market forces may generally be *more* effective in eliminating harms to consumers than government intervention... Even worse, the *Order's* assertions that government intervention is always necessary to protect consumers ignore the clear evidence on the record indicating that the problems of slamming, cramming and consumer confusion may not be significant in certain telecommunications markets, such as wireless...<sup>30</sup>

The Commission's approach is troubling because rather than approaching regulation from the perspective that regulation is appropriate only where markets fail in some sense, the Commission would adopt regulation unless it can be convinced that no regulation is necessary. This perspective, as demonstrated above, is not only inconsistent with the intent behind the 1996 Act and Section 10, but is also flawed from an economic perspective.

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<sup>30</sup> *FNPRM* at 71-77, Separate Statement of Commissioner Michael K. Powell.



### III. CONCLUSION


For the foregoing reasons, the Commission should not apply truth-in-billing rules designed to address slamming and cramming concerns to wireless carriers.

Dated: July 26, 1999

Respectfully submitted,

GTE Service Corporation and its affiliated  
domestic telephone operating wireless, and  
long distance companies

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## ATTACHMENT A



WIRELESS

Bill Date.....  
Account Number.....Page 1 of 4  
July 10, 1999**Account  
Summary**

Previous Ending Balance	\$642.24
Payments Received - Thank you	-75.30
PAST DUE AMOUNT	<u>\$566.94</u>
Monthly Recurring Charges	17.95
Billing Credits and Other Charges	
Other Charges & Credits	2.85
Total Billing Credits and Other Charges	2.85
Total Airtime Charges	.00
Long Distance Charges	7.04
Roamer Charges	297.05
Taxes, Surcharges and Fees	<u>11.23</u>
TOTAL CURRENT CHARGES DUE BY AUGUST 07, 1999	336.12
TOTAL AMOUNT DUE	<u>\$903.06</u>

**Customer  
Care***Please mail all payments to:*GTE WIRELESS  
P. O. BOX 660636  
DALLAS TX 75266-0636*For inquiries call (800)727-2444 or see page 2 for correspondence address*

WIRELESS

GTE WIRELESS  
P.O. BOX 33050  
ST. PETERSBURG FL 33733Bill Date..... July 10, 1999  
Account Number.....  
Invoice Number.....

Change of Address? Check Box, See Back

☐TOTAL AMOUNT DUE \$903.06  
DUE DATE AUGUST 07, 1999

AMOUNT ENCLOSED

Mail GTE WIRELESS  
payment: P. O. BOX 660636  
to DALLAS TX 75266-0636

725115 0010 0000090306 0000064224 20000064055 971104 0000000000007

## EXPLANATION OF CALL TYPES

Page 2 of 4

P = Peak	PM = Peak Multi-period	E = Extended	*F = Fax
OP = Off-Peak	OM = Off-Peak Multi-period	*R = Home Roaming	*I = Incoming Call Discount
O = Other	C = Credit	*M = Mobile to Mobile Discount	*C = Cell Site Discount
M = Multi-period	W = Weekend	*D = Data	*W = Wide Area Call

## ANSWERS TO FREQUENTLY ASKED QUESTIONS

### Q. To what address may I write regarding my account?

- A. Our correspondence address is: GTE Customer Care  
PO Box 33049  
St. Petersburg, FL 33733

### Q. What is my subscriber number?

- A. The subscriber number located in the upper right hand corner of your bill is your wireless or pager number. Pagers beginning with 800 appear as 008 plus the last seven digits of your pager number. For example pager number 800-123-xxxx will appear as subscriber number 008-123-xxxx on your bill.

### Q. What if the rate period changes during a call?

- A. When a wireless call spans two different rate periods (peak and off-peak, for instance), each portion of the call is billed at its respective rate.

### Q. How will I recognize an incoming call on my bill?

- A. Incoming calls to your wireless phone will be indicated in the "City Called" column on the call detail pages (available only with detailed billing) by either your own wireless phone number or the word "incoming". The number of the party placing the call will not be listed on the bill.

### Q. What are roaming charges?

- A. Roaming charges are fees incurred while using your wireless service outside your local calling area. If you use your wireless service on or near the fringes of your local calling area, you may incur roaming charges.

### Q. How am I charged for receiving calls while roaming?

- A. You are subject to being charged airtime & long distance for receiving calls while roaming. These charges will list on two separate lines in the call detail.

### Q. Why do I have two calls listed as starting at the same time?

- A. Since we bill in one minute increments, a caller may place a call to deliver a brief message, hang up and place a second call before that minute expires. This would result in two calls having the same start time on your call detail.

Change of Address-Please check the change of address box on the front of this page in blue or black ink.

Note: If you wish to change the name on your account, please contact our customer service office.

OFFICE USE ONLY - DO NOT WRITE ABOVE THIS LINE.

Name .....

Address .....

City ..... State ..... Zip Code .....

Home Phone ..... Business Phone .....



WIRELESS

Page 3 of 4  
July 10, 1999Bill Date.....  
Account Number.....  
Subscriber Number..

## MESSAGES FROM GTE WIRELESS

SIGN UP YOUR FAMILY FOR FAMILYNET NOW AND  
ADDITIONAL PHONE LINES ARE ONLY \$10 EACH!Plus, you save even more since local calls to members of your FamilyNet  
are free through Labor Day. After that, calls between FamilyNet  
members are just ten cents per minute. For more details, call  
1-888-483-9068 now and sign up for FamilyNet.

CALL NOW AND SAVE 15% ON WIRELESS ACCESSORIES!

Now you can order your wireless accessories by phone and have them  
delivered directly to your doorstep. Also, you will receive a 15%  
discount for orders of 2 accessories or more. You can purchase all the  
latest accessories for your wireless phone such as: Extended life  
batteries, Cigarette lighter adapters, Trickle/Travel charger, Hands Free  
Kits and much more.Just call the Accessory Order Line at 1-888-829-7236 and have your order  
conveniently shipped today. Offer and prices only available for  
telephone orders.

## PAYMENT ACTIVITY

Date	Description	Amount
07/08	PAYMENT APPLIED	75.30
Total of Payments Received - Thank You		\$75.30

## DETAIL OF SUBSCRIBER CHARGES

Monthly Recurring Charges	17.95
07/11/99 to 08/10/99	
Total Monthly Recurring Charges	17.95
Billing Credits and Other Charges	
Express Dir assist charge 3 calls @ 0.95	2.85
Total Billing Credits and Other Charges	2.85
Detail of airtime usage	
Rate plan: MAM11 /Corp Vip Incmg Disc	Included Minutes 75.00
Rate Plan Included Minutes	
Peak = 60.50 min. @ \$ 0.000	.00
Incoming = 1.00 min. @ \$ 0.000	.00
Total Minutes = 61.50	
Total Minutes Used = 61.50	
Total Airtime Charges	.00
Long Distance Charges	7.04
Roamer Charges	297.05
Taxes, Surcharges and Fees	
Federal Excise Tax	8.81
State 911 Tax	0.80
State Utility Sales Tax	0.64
State Franchise Fee	0.68
Federal Universal Svc Fee	0.30
Total Taxes, Surcharges and Fees	11.23
Total Current Charges	\$336.12

## AIRTIME AND LONG DISTANCE DETAIL SUMMARY

Date	Time	City	ST	Number	Type	Min.	Air	LD	Total
6/07	9:03 AM	NEW YORK	NY	(919) 270-8329	P	2.00	0.00	0.56	0.56
6/07	3:09 PM	NEW YORK	NY	(919) 270-8329	P	4.50	0.00	1.40	1.40
6/07	7:08 PM	KINGSTON	NY	(919) 270-8329	P	1.50	0.00	0.32	0.32
6/11	8:26 AM	AUSTIN	TX	(919) 270-8329	P	1.00	0.00	0.28	0.28
6/11	9:54 AM	AUSTIN	TX	(919) 270-8329	P	5.50	0.00	1.68	1.68
6/11	10:51 AM	AUSTIN	TX	(919) 270-8329	P	2.00	0.00	0.56	0.56
6/11	8:26 PM	CARY	NC	(919) 462-8324	P	1.00	0.24	0.00	0.24
6/12	12:32 PM	EXPRESS DA		411	P	2.50	0.60	0.00	0.60
6/12	12:35 PM	EXPRESS DA		411	P	1.00	0.24	0.00	0.24
6/12	12:35 PM	RALEIGH	NC	(919) 790-9992	P	1.50	0.36	0.00	0.36
6/12	12:49 PM	EXPRESS DA		411	P	1.00	0.24	0.00	0.24
6/12	12:50 PM	RALEIGH	NC	(919) 847-4119	P	1.00	0.24	0.00	0.24
6/12	1:18 PM	ZEBULON	NC	(919) 404-2849	P	2.00	0.48	0.00	0.48
6/12	4:36 PM	ZEBULON	NC	(919) 404-2849	P	1.50	0.36	0.00	0.36
6/13	1:11 PM	CARY	NC	(919) 462-8324	P	1.50	0.36	0.00	0.36
6/14	5:55 AM	WATS	NC	(800) 235-9426	P	23.50	5.64	0.00	5.64
6/14	7:03 AM	WHITE PLS	NY	(914) 288-3958	P	1.50	0.36	0.56	0.92
6/18	3:19 PM	CARY	NC	(919) 462-8324	P	1.00	0.24	0.00	0.24
6/18	6:16 PM	CARY	NC	(919) 462-8324	P	2.50	0.60	0.00	0.60
6/18	6:25 PM	CARY	NC	(919) 462-8324	P	1.00	0.24	0.00	0.24
6/19	1:42 PM	CARY	NC	(919) 462-8324	P	1.50	0.36	0.00	0.36
6/20	2:31 PM	CARY	NC	(919) 462-8324	P	4.50	1.08	0.00	1.08
6/20	2:35 PM	*INCOMING*		(919) 270-8329	*I	1.00	0.15	0.00	0.15
6/21	11:51 AM	WHITE PLS	NY	(914) 288-3958	P	1.00	0.24	0.28	0.52
6/25	8:02 PM	CARY	NC	(919) 462-8324	P	1.00	0.24	0.00	0.24
7/01	10:15 AM	YONKERS	NY	(919) 270-8329	P	5.00	0.00	1.40	1.40
7/01	7:36 PM	CARY	NC	(919) 462-8324	P	1.00	0.24	0.00	0.24
7/01	7:44 PM	CARY	NC	(919) 462-8324	P	1.00	0.24	0.00	0.24
7/03	3:22 PM	CARY	NC	(919) 462-8324	P	3.50	0.84	0.00	0.84
7/03	3:54 PM	CARY	NC	(919) 462-8324	P	2.00	0.48	0.00	0.48
7/03	4:02 PM	CARY	NC	(919) 462-8324	P	1.50	0.36	0.00	0.36
7/03	7:45 PM	CARY	NC	(919) 380-1323	P	1.00	0.24	0.00	0.24

See Page 2 for explanation of call types

## DETAIL OF ROAMER CHARGES

Calls placed on MCCAW CELLULAR COMMUNICATIONS NEW YORK NON-WIRELINE SID 00025

Date	Time	City	ST	Number	Type	Min.	Air	LD	Tax	Total
5/27	7:37 AM	ROAMER	CL	(800) 225-5288	P	8.00	7.92	0.00	0.91	8.83
5/27	8:56 AM	ROAMER	CL	(919) 270-8329	P	1.00	0.99	0.00	0.12	1.11
5/27	8:53 PM	ROAMER	CL	(800) 225-5288	P	2.00	1.98	0.00	0.24	2.22
5/27	8:55 PM	ROAMER	CL	(800) 225-5288	P	4.00	3.96	0.00	0.48	4.44
5/28	12:16 PM	DURHAM RT	NC	(919) 254-4609	P	7.00	6.93	1.40	1.10	9.43
5/28	12:30 PM	ROAMER	CL	(800) 225-5288	P	10.00	9.90	0.00	1.15	11.05
5/28	1:59 PM	MONROE	NY	(914) 782-0692	P	4.00	3.96	0.80	0.65	5.41
5/28	2:06 PM	FARMINGTON	MI	(248) 471-3754	P	1.00	0.99	0.20	0.14	1.33
5/28	2:10 PM	FARMINGTON	MI	(248) 471-3754	P	3.00	2.97	0.60	0.49	4.06
5/28	2:15 PM	POUGHKEPSE	NY	(914) 452-1156	P	3.00	2.97	0.60	0.49	4.06
5/28	2:18 PM	ROAMER	CL	(800) 225-9426	P	3.00	2.97	0.00	0.36	3.33
6/01	8:29 AM	DURHAM RT	NC	(919) 254-8721	P	7.00	6.93	1.40	1.10	9.43
6/01	8:38 AM	ROAMER	CL	(800) 225-5288	P	1.00	0.99	0.00	0.12	1.11
6/01	8:39 AM	ROAMER	CL	(800) 225-5288	P	5.00	4.95	0.00	0.55	5.50
6/01	9:31 AM	DURHAM RT	NC	(919) 254-8721	P	3.00	2.97	0.60	0.49	4.06
6/01	9:34 AM	DURHAM RT	NC	(919) 254-8721	P	2.00	1.98	0.40	0.31	2.69
6/01	9:36 AM	ROAMER	CL	(919) 270-8329	P	9.00	8.91	0.00	1.03	9.94
6/01	11:57 AM	DURHAM RT	NC	(919) 254-8721	P	1.00	0.99	0.20	0.14	1.33
6/01	12:01 PM	DURHAM RT	NC	(919) 254-8721	P	4.00	3.96	0.80	0.65	5.41



WIRELESS

Page 6 of 4

July 10, 1999

Bill Date.....

Account Number.....

Subscriber Number..

6/01 12:06 PM	DURHAM RT	NC	(919) 254-8721 P	1.00	0.99	0.20	0.14	1.33
6/01 12:08 PM	ROAMER	CL	(919) 270-8329 P	2.00	1.98	0.00	0.24	2.22
6/01 12:10 PM	DURHAM RT	NC	(919) 254-8721 P	1.00	0.99	0.20	0.14	1.33
6/01 12:12 PM	ROAMER	CL	(919) 270-8329 P	3.00	2.97	0.00	0.36	3.33
6/01 2:39 PM	DURHAM RT	NC	(919) 254-8721 P	16.00	15.84	3.20	2.58	21.62
6/01 2:44 PM	ROAMER	CL	(919) 270-8329 P	1.00	0.99	0.00	0.12	1.11
6/02 10:51 AM	ROAMER	CL	(800) 225-5288 P	5.00	4.95	0.00	0.55	5.50
6/02 1:02 PM	DURHAM RT	NC	(919) 254-4609 P	1.00	0.99	0.20	0.14	1.33
6/02 1:03 PM	DURHAM RT	NC	(919) 254-4609 P	2.00	1.98	0.40	0.31	2.69
6/03 2:52 PM	DURHAM RT	NC	(919) 254-8721 P	3.00	2.97	0.60	0.49	4.06

6/03 2:55 PM	DURHAM RT	NC	(919) 254-8721 P	2.00	1.98	0.40	0.31	2.69
6/03 3:06 PM	DURHAM RT	NC	(919) 254-8721 P	1.00	0.99	0.20	0.14	1.33
6/03 3:36 PM	ROAMER	CL	(919) 270-8329 P	3.00	2.97	0.00	0.36	3.33
6/03 4:05 PM	ROAMER	CL	(800) 225-5288 P	8.00	7.92	0.00	0.91	8.83
6/07 8:54 AM	ROAMER	CL	(800) 225-5288 P	6.00	5.94	0.00	0.67	6.61
6/07 9:00 AM	DURHAM RT	NC	(919) 254-8721 P	2.00	1.98	0.40	0.31	2.69
6/07 9:03 AM	ROAMER	CL	(919) 270-8329 P	2.00	1.98	0.00	0.24	2.22
6/07 9:05 AM	DURHAM RT	NC	(919) 254-8721 P	4.00	3.96	0.80	0.65	5.41
6/07 1:42 PM	POUGHKEPSE	NY	(914) 433-7678 P	1.00	0.99	0.20	0.14	1.33
6/07 3:09 PM	ROAMER	CL	(919) 270-8329 P	4.00	3.96	0.00	0.48	4.44

6/07 5:55 PM	RHINEBECK	NY	(914) 876-6788 P	1.00	0.99	0.20	0.14	1.33
6/07 5:57 PM	POUGHKEPSE	NY	(914) 452-0824 P	2.00	1.98	0.40	0.31	2.69
6/07 6:29 PM	RHINEBECK	NY	(914) 876-6788 P	2.00	1.98	0.40	0.31	2.69
6/07 6:33 PM	RHINEBECK	NY	(914) 876-6788 P	1.00	0.99	0.20	0.14	1.33
6/09 8:23 AM	ROAMER	CL	(800) 225-5288 P	2.00	1.98	0.00	0.24	2.22
6/09 10:14 PM	ROAMER	CL	(800) 225-5288 P	3.00	2.97	0.00	0.36	3.33
6/09 10:21 PM	ROAMER	CL	(800) 225-5288 P	4.00	3.96	0.00	0.48	4.44
6/10 10:17 AM	WHITE PL	NY	(914) 642-5669 P	6.00	5.94	0.38	0.74	7.06
6/10 10:30 AM	ARMONK VLG	NY	(914) 499-2599 P	2.00	1.98	0.23	0.26	2.47
6/10 10:32 AM	ROAMER	CL	(800) 225-5288 P	2.00	1.98	0.00	0.24	2.22

6/10 10:40 AM	DURHAM RT	NC	(919) 254-8721 P	3.00	2.97	0.60	0.49	4.06
6/14 9:33 AM	ROAMER	CL	(800) 225-9426 P	4.00	3.96	0.00	0.48	4.44
6/14 9:47 AM	WHITE PL	NY	(914) 288-3958 P	3.00	2.97	0.23	0.42	3.62
6/14 7:09 PM	DIR. ASST.	CL	411 P	1.00	0.99	0.75	0.30	2.04
6/14 7:10 PM	SCARSDALE	NY	(914) 472-6373 P	2.00	1.98	0.18	0.25	2.41
6/15 9:11 AM	WHITE PL	NY	(914) 288-3958 P	1.00	0.99	0.13	0.13	1.25
6/15 8:04 PM	ROAMER	CL	(800) 225-5288 P	2.00	1.98	0.00	0.24	2.22
6/17 1:05 PM	POUGHKEPSE	NY	(914) 452-1156 P	2.00	1.98	0.40	0.31	2.69
6/17 1:07 PM	WILTON	CT	(203) 761-6773 P	2.00	1.98	0.40	0.31	2.69
6/17 1:15 PM	ROAMER	CL	(800) 225-5288 P	2.00	1.98	0.00	0.24	2.22

6/17 1:29 PM	ROAMER	CL	(800) 225-5288 P	3.00	2.97	0.00	0.36	3.33
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Calls placed on MCCA W CELLULAR COMMUNICATIONS AUSTIN NON-WIRELINE SID 00107

Date	Time	City	ST	Number	Type	Min.	Air	LD	Tax	Total
6/10	5:09 PM	MOBILE	CL	(512) 413-5813 P		3.00	2.97	0.00	0.28	3.25
6/11	7:22 AM	ROAMER	CL	(800) 225-5288 P		9.00	8.91	0.00	0.71	9.62
6/11	7:26 AM	ROAMER	CL	(919) 270-8329 P		1.00	0.99	0.00	0.08	1.07
6/11	8:54 AM	ROAMER	CL	(919) 270-8329 P		5.00	4.95	0.00	0.40	5.35
6/11	9:51 AM	ROAMER	CL	(919) 270-8329 P		2.00	1.98	0.00	0.20	2.18

Calls placed on CELLULAR SYSTEM 28147 NON-WIRELINE SID 28147

Date	Time	City	ST	Number	Type	Min.	Air	LD	Tax	Total
6/08	8:11 AM	TOLL FREE	CL	(800) 225-5288 P		8.00	7.92	0.00	0.99	8.91

Calls placed on CELLULAR SYSTEM 26371 NON-WIRELINE SID 26371

Date	Time	City	ST	Number	Type	Min.	Air	LD	Tax	Total
6/07	7:09 PM	INCOMING	CL	(919) 270-8329 P		2.00	1.98	0.00	0.23	2.21
6/07	7:11 PM	TOLL FREE	CL	(800) 225-5288 P		5.00	4.95	0.00	0.59	5.54
6/17	2:18 PM	CARY	NC	(919) 462-8324 P		4.00	3.96	2.00	0.49	6.45
6/17	2:28 PM	CARY	NC	(919) 462-8324 P		5.00	4.95	2.50	0.59	8.04
6/17	8:51 PM	TOLL FREE	CL	(800) 225-5288 P		5.00	4.95	0.00	0.59	5.54

Total charges	245.00	242.55	22.80	31.70	297.05
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WIRELESS

Page 1 of 3  
Bill Date..... July 10, 1999  
Account Number.....

**Account  
Summary**

Previous Ending Balance	\$146.49
Payments Received - Thank you	- 146.49
BALANCE FORWARD	<u>\$ .00</u>
Monthly Recurring Charges	17.95
Billing Credits and Other Charges	
Other Charges & Credits	.95
Total Billing Credits and Other Charges	.95
Total Airtime Charges	16.32
Long Distance Charges	1.35
Roamer Charges	7.30
Taxes, Surcharges and Fees	<u>4.64</u>
TOTAL CURRENT CHARGES DUE BY AUGUST 07, 1999	48.51
TOTAL AMOUNT DUE	<u>\$48.51</u>

**Customer  
Care***Please mail all payments to:*

GTE WIRELESS  
P. O. BOX 660636  
DALLAS TX 75266-0636

*For inquiries call (800)727-2444 or see page 2 for correspondence address*

WIRELESS

GTE WIRELESS  
P.O. BOX 33050  
ST. PETERSBURG FL 33733

Bill Date..... July 10, 1999  
Account Number.....  
Invoice Number..... 00280982-325122-0799

Change of Address? Check Box, See Back

☐

TOTAL AMOUNT DUE \$48.51  
DUE DATE AUGUST 07, 1999

AMOUNT ENCLOSED



Mail GTE WIRELESS  
payment: P. O. BOX 660636  
to DALLAS TX 75266-0636



325122 0010 0000004851 0000014649 20000280982 980122 0000000000001

# EXPLANATION OF CALL TYPES

Page 2 of 3

P = Peak	PM = Peak Multi-period	E = Extended	*F = Fax
OP = Off-Peak	OM = Off-Peak Multi-period	*R = Home Roaming	*I = Incoming Call Discount
O = Other	C = Credit	*M = Mobile to Mobile Discount	*C = Cell Site Discount
M = Multi-period	W = Weekend	*D = Data	

## ANSWERS TO FREQUENTLY ASKED QUESTIONS

### Q. To what address may I write regarding my account?

A. Our correspondence address is: GTE Customer Care  
PO Box 33049  
St. Petersburg, FL 33733

### Q. What is my subscriber number?

A. The subscriber number located in the upper right hand corner of your bill is your wireless or pager number. Pagers beginning with 800 appear as 008 plus the last seven digits of your pager number. For example pager number 800-123-xxxx will appear as subscriber number 008-123-xxxx on your bill.

### Q. What if the rate period changes during a call?

A. When a wireless call spans two different rate periods (peak and off-peak, for instance), each portion of the call is billed at its respective rate.

### Q. How will I recognize an incoming call on my bill?

A. Incoming calls to your wireless phone will be indicated in the "City Called" column on the call detail pages (available only with detailed billing) by either your own wireless phone number or the word "incoming". The number of the party placing the call will not be listed on the bill.

### Q. What are roaming charges?

A. Roaming charges are fees incurred while using your wireless service outside your local calling area. If you use your wireless service on or near the fringes of your local calling area, you may incur roaming charges.

### Q. How am I charged for receiving calls while roaming?

A. You are subject to being charged airtime & long distance for receiving calls while roaming. These charges will list on two separate lines in the call detail.

### Q. Why do I have two calls listed as starting at the same time?

A. Since we bill in one minute increments, a caller may place a call to deliver a brief message, hang up and place a second call before that minute expires. This would result in two calls having the same start time on your call detail.

Change of Address-Please check the change of address box on the front of this page in blue or black ink.

Note: If you wish to change the name on your account, please contact our customer service office.

### OFFICE USE ONLY - DO NOT WRITE ABOVE THIS LINE.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
\_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Home Phone \_\_\_\_\_ Business Phone \_\_\_\_\_





WIRELESS

Page 3 of 3  
July 10, 1999Bill Date.....  
Account Number.....  
Subscriber Number..

## MESSAGES FROM GTE WIRELESS

SIGN UP YOUR FAMILY FOR FAMILYNET NOW AND  
ADDITIONAL PHONE LINES ARE ONLY \$10 EACH!

Plus, you save even more since local calls to members of your FamilyNet are free through Labor Day. After that, calls between FamilyNet members are just ten cents per minute. For more details, call 1-888-483-9068 now and sign up for FamilyNet.

## CALL NOW AND SAVE 15% ON WIRELESS ACCESSORIES!

Now you can order your wireless accessories by phone and have them delivered directly to your doorstep. Also, you will receive a 15% discount for orders of 2 accessories or more. You can purchase all the latest accessories for your wireless phone such as: Extended life batteries, Cigarette lighter adapters, Trickle/Travel charger, Hands Free Kits and much more.

Just call the Accessory Order Line at 1-888-829-7236 and have your order conveniently shipped today. Offer and prices only available for telephone orders.

## DETAIL OF LONG DISTANCE SUMMARY

Date	Time	City	ST	Number	Type	Min.	Air	LD	Total
6/17	1:43 PM	MYRTLE BCH	SC	(336) 314-1327	P	4.00	0.00	1.12	1.12
6/19	11:47 AM	MYRTLE BCH	SC	(336) 314-1327	OP	2.00	0.00	0.23	0.23

See Page 2 for explanation of call types

## DETAIL OF ROAMER CHARGES

Calls placed on VANGUARD CELLULAR SYSTEMS MYRTLE BEACH, SC NON-WIREL \$10 01645

Date	Time	City	ST	Number	Type	Min.	Air	LD	Tax	Total
6/17	1:43 PM	ROAMER	CL	(336) 314-1327	P	4.00	3.96	0.00	0.20	4.16
6/18	7:26 PM	MYRTLE BCH	SC	(843) 497-9911	P	1.00	0.99	0.00	0.06	1.05
6/19	11:46 AM	ROAMER	CL	(336) 314-1327	OP	2.00	1.98	0.00	0.11	2.09

Total						7.00	6.93	.00	.37	7.30
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## PAYMENT ACTIVITY

Date	Description	Amount
07/03	PAYMENT APPLIED	146.49

Total of Payments Received - Thank You \$146.49

## DETAIL OF SUBSCRIBER CHARGES

Monthly Recurring Charges	17.95	
06/11/99 to 07/10/99		
Total Monthly Recurring Charges		17.95

Billing Credits and Other Charges		
Express Dir assist charge 1 calls @ 0.95	.95	
Total Billing Credits and Other Charges		.95

Detail of airtime usage		
Rate plan: MAM1E/Corp Vip-Employee	Included Minutes	75.00
Rate Plan Included Minutes		

Peak	= 67.00 min. @ \$ 0.000	.00
Off-Peak	= 8.00 min. @ \$ 0.000	.00
Billed Minutes		
Peak	= 62.00 min. @ \$ 0.240	14.88
Off-Peak	= 6.00 min. @ \$ 0.240	1.44

Total Minutes	= 143.00	
Total Minutes Used	= 143.00	

Total Airtime Charges 16.32

Long Distance Charges 1.35

Roamer Charges 7.30

Taxes, Surcharges and Fees		
Federal Excise Tax	1.32	
State 911 Tax	0.80	
State Utility Sales Tax	1.07	
State Franchise Fee	1.15	
Federal Universal Svc Fee	0.30	

Total Taxes, Surcharges and Fees 4.64

Total Current Charges \$48.51



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WIRELESS

Bill Date.....  
Account Number.....Page 1 of 6  
July 10, 1999**Account  
Summary**

Previous Ending Balance		\$201.63
Payments Received - Thank you		.00
<b>PAST DUE AMOUNT</b>		<b>\$201.63</b>
<small>OVERDUE BALANCES ARE SUBJECT TO LATE FEE CHARGES OF 1% PER MONTH</small>		
Monthly Recurring Charges		62.35
Billing Credits and Other Charges		
Late Fee Charges	2.02	
Total Billing Credits and Other Charges		2.02
 Total Airtime Charges		 150.26
Long Distance Charges		39.53
Roamer Charges		.00
Taxes, Surcharges and Fees		23.53
 TOTAL CURRENT CHARGES DUE BY AUGUST 07, 1999		 277.69
 TOTAL AMOUNT DUE		 \$479.32

**Customer  
Care***Please mail all payments to:*GTE WIRELESS  
P. O. BOX 660636  
DALLAS TX 75266-0636*For inquiries call (800)727-2444 or see page 2 for correspondence address*

WIRELESS

GTE WIRELESS  
P.O. BOX 33050  
ST. PETERSBURG FL 33733Bill Date..... July 10, 1999  
Account Number.....  
Invoice Number.....Change of Address? Check Box, See Back ☐TOTAL AMOUNT DUE \$479.32  
DUE DATE AUGUST 07, 1999AMOUNT ENCLOSED Mail GTE WIRELESS  
payment: P. O. BOX 660636  
to DALLAS TX 75266-0636

325122 0010 0000047932 0000020163 90000296442 980128 00000000000005